

Ortiz & Ortiz, LLP
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New York, New York 10010
Tel. No. 718.522.1117
Norma E. Ortiz
Pro se

Hearing Date and Time:
April 23, 2025 at 10:00 a.m.

Objections Due:
April 16, 2025

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	
	:	
SANTIAGO QUEZADA, SR.,	:	
	:	Case No. 24-22431
	:	
	:	Subchapter V Chapter 11
Debtor.	:	
-----X	:	

**NOTICE OF HEARING ON THE APPLICATION OF
ORTIZ & ORTIZ, LLP TO WITHDRAW AS DEBTOR'S COUNSEL**

PLEASE TAKE NOTICE that, in accordance with General Order M-543 dated March 20, 2020, a **Zoom** hearing to consider the application of Ortiz & Ortiz, LLP ("O & O") to withdraw as Debtor's counsel (the "Withdrawal Application") shall be conducted before the Honorable Sean H. Lane, U.S. Bankruptcy Judge, on the 23rd **day of April, 2025, at 10:00 a.m.** in the United States Bankruptcy Court, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that the hearing will be conducted via zoom.gov. If you wish to attend the videoconference hearing, you must register online with eCourt Appearances at **<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>** by 4:00 p.m. at least one business day before the scheduled hearing. Instructions for appearing at the hearing can be found at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE, that you need not appear at the aforesaid hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the Application must be made in writing and must be filed with the Clerk of the Bankruptcy Court electronically at www.nysb.uscourts.gov no later than seven (7) days before the hearing. If you do not have the ability to file an objection electronically, the objection may be filed with the Clerk of the Court by presenting the Clerk with a copy of the objection saved in .pdf format. A copy of the objection must be provided to (a) the Chambers of the Honorable Sean H. Lane, (b) Ortiz & Ortiz, LLP, at the address listed below, and (c) all parties filing Notices of Appearance, so as to be received no later than seven (7) days prior to the hearing. The objection must comply with the Bankruptcy Rules and the Local Bankruptcy Rules of the court and must state with particularity the legal and factual basis for such objection.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Withdrawal Applications, the O & O shall, on or after the Objection Deadline, submit to the Court an order, which order the Court may enter with no further notice or opportunity to be heard.

Dated: April 2, 2025

New York, New York

/s/Norma E. Ortiz
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Norma E. Ortiz
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Debtor-in-Possession*
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re

SANTIAGO QUEZADA, SR.,

Case No. 24-22431-shl

Debtor.

Subchapter V Chapter 11

-----X

**AMENDED APPLICATION OF ORTIZ & ORTIZ L.L.P. PURSUANT TO LOCAL
RULE 2090-1(e) TO WITHDRAW AS DEBTOR'S COUNSEL**

Ortiz & Ortiz, L.L.P. ("O & O"), counsel to Santiago Quezada, Sr. (the "Debtor"), hereby states, in support of its application (the "Application") to withdraw as counsel, as follows:

1. O & O has served as Debtor's counsel since his voluntary Chapter 11 case was commenced on May 14, 2024.
2. O & O filed the Application on March 20, 2025, that asserted it can no longer represent the Debtor in the prosecution of his case. Ecf. No. 58. The Application sought O & O's permissive withdrawal under, among other things, New York Rule of Professional Conduct Rule 1.16(c). The Debtor informed the undersigned that he consented to this relief.
3. On or about March 24, 2025, at 4:08 p.m, O & O received an affidavit from the Debtor that discharges O & O as his bankruptcy counsel. O & O has informed the Debtor that the Court shall determine who shall serve as Debtor's counsel. However, under New York RPC 1.16(b)(3), a lawyer must withdraw from representing a client when the client discharges the

lawyer, or when the client knowingly and freely assents to the termination of the representation.

RELIEF REQUESTED

4. O & O hereby requests the entry on an order permitting it to withdraw as counsel pursuant to Local Rule 2090-1(e). O & O's request is based upon Rule 1.16 of the New York Rules of Professional Conduct. Rule 1.16 (e) contains a number of grounds for the mandatory withdrawal as an attorney of record. One or more of the grounds contained therein apply to the instant Application. Rule 1.16(b) contains a number of grounds for withdrawal that are mandatory under the New York's Rules of Professional Conduct.

5. O & O requests that Notice of the Application be limited to the Office of the U.S. Trustee, the Subchapter V Trustee, any party that has filed a notice of appearance, and the Debtor. Only one creditor, Maria Pizarro, has appeared and participated in the case, only five proofs of claim were filed, and the Debtor has only six unsecured creditors. O & O asserts that such notice is adequate under the circumstances of this case.

WHEREFORE, O & O requests that the Court grant the relief requested herein, and grant such other and further relief as deemed just.

Dated: April 3, 2025
New York, New York

/s/Norma E. Ortiz
Norma E. Ortiz
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287 Park Avenue South, Ste. 337
New York, NY 10010
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Pro Se

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re

SANTIAGO QUEZADA, SR.,

Case No. 24-22431-shl

Debtor.

Subchapter V Chapter 11

-----X

**ORDER GRANTING AMENDED APPLICATION OF
ORTIZ & ORTIZ, L.L.P., PURSUANT
TO LOCAL RULE 2090-1(e) TO WITHDRAW AS DEBTOR'S COUNSEL**

Upon the Amended Application of Ortiz & Ortiz, L.L.P., ("O & O") pursuant to Local Rules 2090-1(e), to Withdraw as Counsel to Santiago Quezada, Sr., the above-captioned Debtor (the "Application"); notice of the Application having been provided to the Debtor, the Subchapter V Trustee, the Office of the U.S. Trustee, and all parties that have filed ; no written opposition to the Application having been filed and it appearing that sufficient notice having been given and that just cause exists to grant the relief requested in the Application; and for the reasons stated in the Application, it is hereby

ORDERED, that O & O is hereby relieved as counsel to the Debtor in the instant case and authorized to withdraw as counsel of record pursuant to Local Rule 2090-1(e).

White Plains, New York
April , 2025

SEAN H. LANE
U.S. BANKRUPTCY JUDGE